

WHISTLEBLOWER REPORT

PRIVACY POLICY

Last updated: 17.10.2024

1. INTRODUCTION

The aim of this Privacy Policy (*"the Policy"*) is to explain how we collect, process and/or use the personal information that you provide us filling out the Whistleblower Report (*"the Form"*) and attaching the documentation (*"the Attachments"*)

It also describes your choices regarding use, access, and correction of your personal information. For purposes of this Policy, personal information shall mean any information relating to an identified or identifiable natural person.

We have tried to keep this policy as simple and plain as possible. However, if any part is unclear to you, contact us at privacy@hudson.com.mt and we will respond to your query in due time and clarify any doubt you may have.

This Policy applies to you only if you are a natural person resident in the European Economic Area ("EEA").

2. DATA CONTROLLER

The Data Controller ("the Controller"), i.e. the entity who determines the purposes and means of data processing, is Hudson Holdings Limited company incorporated in Malta with offices at Hudson House, Burmarrad Road, Burmarrad, SPB9060, Malta on behalf of the Hudson group of companies. The controller is reachable at privacy@hudson.com.mt.

3. INFORMATION WE COLLECT

When you fill out the Form with your personal information and submit it together with the Attachments, we collect that personal information for processing and use in accordance to the terms set out by this Policy.

We collect the following categories of personal information about you (*"Your Data"*):

3.1 Form

- i) Personal details: (e.g name, surname, contact information, job title) if voluntarily provided;
- ii) Details of the Report: description of the misconduct or violation, supporting documents, names of involved parties.

You have the option to submit your report anonymously in which case we will not process your personal details. However, please note that anonymity may limit our ability to follow up or provide updates regarding the investigation.

4. PURPOSES AND LEGAL BASIS

We use the information provided in the Form for the following purposes:-

- (a) to investigate and address the concerns or allegations outlined in your report;
- (b) to ensure compliance with legal obligations under the Whistleblower Protection Act (Chap. 527 of the Laws of Malta) ("the Act");
- (c) to maintain records of reported incidents for regulatory compliance and internal review.

Your Data is collected for the above-stated purposes and it is processed according to the legal basis identified below:

- i) **Legal Obligation:** to comply with all applicable laws including the Act;
- ii) **Legitimate Interests:** to investigate allegations of misconduct and ensure a safe, ethical working environment.

5. RECIPIENTS OF PERSONAL DATA

- 5.1 Your personal data may be shared:-
- 5.1.1 between the undertakings forming part of the Hudson Group for the purposes of investigating the matter further;
 - 5.1.2 with the privacy team in cases where your request concerns the processing of Your Data under this policy;
 - 5.1.3 with legal advisors / consultants depending on the subject-matter reported;
 - 5.1.4 with the competent authorities as the case may be.
- 5.2 Subject to the foregoing, Your personal data is never otherwise transferred outside of the European Economic Area, to countries which are not deemed to offer adequate level of protection of personal data as established by the European Commission, and to international organizations.
- 5.3 We do not sell, trade or otherwise transfer any personal information to third parties.
- 5.4 We will release your data if we are obliged to do so to comply with any law, regulation or court order.

6. ENVISAGED DATA RETENTION PERIODS

We will retain Your Data for as long as necessary to fulfil the purposes outlined in this Privacy Policy and to comply with legal obligations. The retention period will, therefore, vary based on the matter reported and the investigation that ensues. In all cases, Your Data will not be retained for more than five (5) years from when the matter is concluded without further recourse.

7. YOUR RIGHTS

7.1 As a data subject you have extensive rights when it comes to the processing of your personal data.

Your rights, listed below, may be enforced by contacting the Controller by email using the contact details provided above.

You are guaranteed a response within 30 days month from the date of receipt of your enquiry.

If your request is particularly complex or we need to process an extraordinary number of simultaneous requests, our reply may take longer but will be provided no later than 2 months from the date of receipt of your enquiry. This reply will also include details explaining the reason for the delay in our response.

We will provide the information in digital format or if preferred in hard copy format.

Such requests will not incur any fee, except when:

(i) Your requests are manifestly unfounded or excessive, in particular because of their repetitive character. In this case we will charge a reasonable fee, taking into account the administrative costs of providing the information or communication or taking the action requested. In this case, we may also refuse to act on the request after having explained our position;

(ii) You request the information on paper and posted. In that case, we will charge you the postage fees.

Should we have reasonable doubts concerning your identity when making the request above, we may require additional information, necessary to confirm your identity.

Your rights are:

7.2 Access

You may obtain confirmation from us as to whether or not your personal data is being processed including:

- (i) the purposes of the processing;

- (ii) the categories of personal data concerned;
- (iii) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- (iv) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- (v) the existence of the right to request from the Controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- (vi) the right to lodge a complaint with the supervisory authority;
- (vii) the existence of automated decision-making, including profiling.

7.3 Rectification

In case your data is inaccurate, incomplete or out-of-date, you have the right to rectify it.

7.4 Deletion (“the right to be forgotten”)

You have the right to have your personal data erased in case:

- (i) the data is no longer necessary in relation to the purposes for which it was collected or otherwise processed;
- (ii) You have withdrawn consent to process your data and there is no other legal basis legitimating its processing;
- (iii) You have objected to processing your data and there is no other legal basis legitimating its processing;
- (iv) Your personal data has been unlawfully processed;
- (v) Your personal data has to be erased in order to ensure compliance with any legal obligations arising from any legislation enacted within the EU or any member state.

7.5 Restriction

You have the right to request a restriction on the processing of your data in case:

- (i) You contest the accuracy of your personal data, for a period enabling us to verify the accuracy of such data;
- (ii) The processing of your data is unlawful, and you oppose the erasure of your personal data and request the restriction of their use instead;
- (iii) We no longer need the personal data for the purposes of the processing;
- (iv) We no longer need your data, but we are required by you to retain the data for the establishment, exercise or defence of legal claims;
- (v) You have objected to processing (as specified in detail below), pending the verification whether our legitimate grounds override yours.

When you restrict processing, your personal data will, with the exception of storage, only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of EU or of a member state.

In case you have obtained restriction of processing as per above, we will inform you before the restriction of processing is lifted.

Please note that some rights may not apply if data is submitted anonymously or if we are required retain certain information by law.

7.6 Data portability

You enjoy a right to data portability with respect to your Personal Data held by the Controller and the Controller hereby binds itself to provide you with the Personal Data concerning yourself which you have provided to the Hudson, in a structured, commonly used and machine-readable format. In addition, you enjoy the right to transmit that data to another data controller without hindrance from Hudson

7.7 Complaint

In addition to the above, and without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with the competent supervisory authority if you consider that your personal data has been processed unlawfully.

8. SECURITY

8.1 The Controller takes reasonable and appropriate administrative, technical and physical measures to protect the confidentiality, integrity and availability of Personal Data, whether in electronic or tangible, hard copy form.

8.2 The Controller takes reasonable steps to protect Personal Data from loss, misuse and unauthorized access, disclosure, alteration and destruction.

8.3 The controller has taken appropriate measures to be able to detect, investigate and report breaches that may involve personal data.

9. APPLICABLE LAW

The law applicable to the processing activities, and to this Policy, shall be Regulation EU 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) and any other Law of Malta, as deemed applicable.